

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY DOCUMENT ELECTRONICALLY FILED DOC #: DATE FILED: 7/13/18
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UNITED STATES OF AMERICA

- v. -

RAMON PAULINO,

Defendant.

INDICTMENT

18 Cr.

18 CRIM 489

COUNT ONE

(Violent Crime in Aid of Racketeering)

The Grand Jury charges:

THE ENTERPRISE

1. At all times relevant to this Indictment, RAMON PAULINO, the defendant, was a member and associate of the Trinitarios gang, a criminal organization whose members and associates engaged in, among other things, attempted murder, assault with a dangerous weapon, assault resulting in serious bodily injury, and narcotics trafficking.

2. At all times relevant to this Indictment, the Trinitarios, including its leadership, membership, and associates, constituted an "enterprise," as defined by Title 18, United States Code, Sections 1959(b)(2) and 1961(4), that is, a group of individuals associated in fact, although not a legal entity, engaged in, and the activities of which affected, interstate and foreign commerce. The enterprise constituted an

ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

PURPOSES OF THE ENTERPRISE

3. The purposes of the enterprise included the following:

a. Preserving and protecting the power of the enterprise and its members and associates through attempted murder, assault with a dangerous weapon, assault resulting in serious bodily injury, and other acts of violence.

b. Enriching the members and associates of the enterprise through, among other things, the distribution of narcotics.

c. Promoting and enhancing the enterprise and the activities of its members and associates.

MEANS AND METHODS OF THE ENTERPRISE

4. Among the means and methods employed by the members and associates of the Enterprise in conducting and participating in the conduct of the affairs of the Enterprise were the following:

a. Members and associates of the enterprise committed, conspired to commit, and attempted to commit acts of violence against others, including attempted murder, assault with a dangerous weapon, and assault resulting in serious bodily

injury, to maintain their positions in and to advance their positions in the Enterprise.

b. Members and associates of the Enterprise used physical violence and threats of violence, including attempted murder, assault with a dangerous weapon, and assault resulting in serious bodily injury, against others, including individuals associated with rival gangs.

c. Members and associates of the Enterprise sold narcotics.

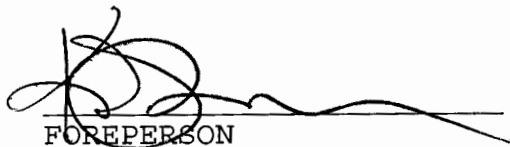
5. At all times relevant to this Indictment, the Trinitarios, through their members and associates, engaged in racketeering activity, as that term is defined in Title 18, United States Code, Sections 1959(b)(1) and 1961(1), namely, acts involving murder, in violation of New York Penal law, and offenses involving trafficking of controlled substances in violation of Title 21, United States Code, Sections 841 and 846.

VIOLATION


6. On or about June 18, 2018, in the Southern District of New York, RAMON PAULINO, the defendant, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the Trinitarios, and for the purpose of gaining entrance to and maintaining and increasing position in the Trinitarios, intentionally and knowingly assaulted an

individual with a dangerous weapon resulting in serious bodily injury, and attempted to murder that individual, and aided and abetted the same, to wit, PAULINO and others committed, and aided and abetted, the attack of a victim (the "Victim") in the vicinity of the East Gun Hill Road exit of the Bronx River Parkway in the Bronx, New York, during which PAULINO and others used a log, a machete, and a knife to beat and stab the Victim, resulting in serious bodily injury to the Victim, in violation of New York Penal Law, Sections 120.05, 120.10, 120.14, 125.25, 110.00, and 20.00.

(Title 18, United States Code, Sections 1959(a)(3), 1959(a)(5), and 2.)



FOREPERSON



GEOFFREY S. BERMAN
United States Attorney

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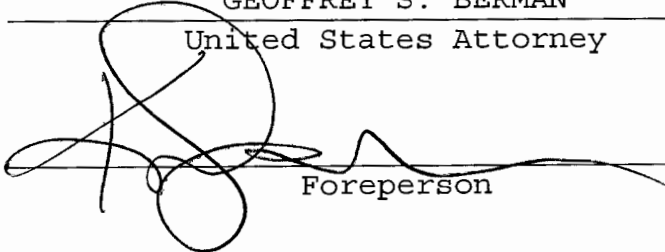
RAMON PAULINO,

Defendant.

INDICTMENT

(18 U.S.C. §§ 1959(a)(3), 1959(a)(5) &
2.)

GEOFFREY S. BERMAN
United States Attorney



Foreperson

7/13/18 FILED INDICTMENT CASE ASSIGNED TO J. McMAHON
COT, USMT